

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

GAIL DINES,

Plaintiff,

CASE NO. 1:16-cv-11876

v.

WHEELOCK COLLEGE,
a corporation, JACKIE JENKINS-SCOTT, in
her official and individual capacities,
KATHERINE S. TAYLOR, in her official and
individual capacities; and KINGSTON BAY
GROUP, a limited liability
corporation.

Defendants.

**PLAINTIFF'S NOTICE OF INTENT TO FILE MOTION FOR LEAVE TO FILE
REPLY TO WHEELOCK DEFENDANTS' OPPOSITION TO PLAINTIFF'S
MOTION FOR ADMISSION OF VISITING PRO HAC VICE**

Plaintiff GAIL DINES ("Plaintiff"), by and through undersigned counsel, hereby gives notice of her intention to file a motion for leave to file a reply to Defendants WHEELOCK COLLEGE, JACKIE JENKINS-SCOTT, and KATHERINE S. TAYLOR's (collectively, the "Wheelock Defendants") Opposition to her "Motion for Admission of Visting Pro Hac Vice" ("the Motion") seeking permission for Dr. Ann Olivarius to appear *pro hac vice* as counsel for Plaintiff.

Wheelock Defendants' Opposition to the Motion raises serious allegations regarding Dr. Ann Olivarius' professional conduct. As a result, Plaintiff will move that she be given an opportunity to respond and counter these allegations to enable the Court to make an informed judgment as to her Motion. To that end, the undersigned counsel has contacted Defendants' counsel to arrange a meet and confer meeting in accordance with Local Rule 7.1(a)(2).

Plaintiff respectfully requests that the Court defer ruling on the Motion until Plaintiff has filed her motion for leave.

DATED: NOVEMBER 11, 2016

Respectfully submitted,

BY: /s/ Anita Vadgama

BY: Attorney Anita Vadgama
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Attorney for Plaintiff
GAIL DINES

CERTIFICATION OF SERVICE

I, Anita S. Vadgama, hereby certify that the document was filed through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing on this date.

/s/ Anita Vadgama

Anita S. Vadgama